

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL;  
24-mc-00353-LJL

**MOTION TO WITHDRAW AS  
COUNSEL AND  
DECLARATION OF DAVID  
LABKOWSKI IN SUPPORT  
OF THAT MOTION**

DAVID LABKOWSKI hereby declares, pursuant to 28 U.S.C. § 1746:

1. I am a member of the Bar of this Court and the sole shareholder of Labkowski Law, P.A. I am co-counsel for Defendant, Rudolph W. Giuliani (“Defendant”), in both 24-cv-06563-LJL (the “Homestead Action”) and 24-mc-00353-LJL (the “Turnover Proceeding”).
2. I submit this Declaration, pursuant to S.D.N.Y. Local Rule 1.4, and Rule 1.16 of the New York Rules of Professional Conduct, in support of a motion to withdraw as counsel for Defendant.
3. I have reviewed the Declaration of Kenneth A. Caruso submitted in support of the motion to withdraw as counsel. I hereby adopt and incorporate its contents by reference.
4. For the foregoing reasons, we respectfully request that the Court grant this motion to withdraw and enter an order relieving Kenneth Caruso Law LLC and Labkowski Law, P.A. as counsel for Defendant.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on November 13, 2024

By: /s/ David Labkowski  
Labkowski Law, P.A.

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*Attorneys for Defendant,  
Rudolph W. Giuliani*